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Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

MEMO ENDORSED

NEW JERSEY OFFICE
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311

201-342-8865

June 14, 2021

6/15/21

Bail Modifications as requested
herein granted.

Colleen McMahon

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully makes two bail modification applications. On Wednesday, June 16, 2021, Cahill requests permission to travel to his house in Long Beach, New York, from 9:00 am to 7:00 pm so that he can complete the opening and preparation of his home for the summer season. The exact address of the home is known to Pretrial Services ("PTS") and the government. Additionally, from June 19, 2021, Cahill respectfully requests permission to attend a family gathering from 12:00 – 6:00 pm for Father's Day at a location near his home that is also known by PTS and the government. PTS, by United States Pretrial Service Officer Leo Barrios, consents to these applications and the government, by Assistant United States Attorney Jason Swergold, agrees with PTS' position on these applications.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin

Sanford Talkin

cc: AUSA Jun Xiang (by ECF)
AUSA Danielle Sasso (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Leo Barrios (by email)

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